

# EXHIBIT C

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

WALCO FUNDING, LLC,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2023 L 012436
	)	
DRIVESMART AUTO CARE, INC.,	)	
NATIONWIDE VEHICLE ASSURANCE CORP.	)	
D/B/A MOTOR VEHICLE ASSURANCE, and	)	
DANIEL J. RODD,	)	
	)	
Defendants.	)	

**PLAINTIFF'S ANSWER TO DEFENDANTS' FIRST SET OF INTERROGATORIES**

Plaintiff, Walco Funding, LLC ("Walco"), by and through its attorneys, Horwood Marcus & Berk Chartered, and for its response to the First Set of Interrogatories propounded upon it by Defendants, DriveSmart Auto Care, Inc. ("DriveSmart"), Nationwide Vehicle Assurance Corp. ("Nationwide"), and Daniel J. Rodd ("Rodd"), states as follows:

**ANSWERS TO INTERROGATORIES**

1. Identify each of WalCo Funding, LLC's members.
  - a. For each individual member identified in response to Interrogatory 1, provide their names, primary residency, business addresses and citizenship.
  - b. For each business entity identified in response to Interrogatory 1, provide its names, venue of incorporation, primary place of business, corporate offices, and agent of service of process.

**RESPONSE:** WalCo's members are (i) Edward M. Walder Exempt Trust; (ii) Paul M. Walder Exempt Trust; and (iii) Lincoln Park Capital, LLC.

- a. WalCo does not have any individual members.
- b. Lincoln Park Capital, LLC; Venue of Organization: Illinois; Primary Place of Business: 415 N. LaSalle Drive, Suite 700B, Chicago, IL 60654; Corporate Offices: 415 N. LaSalle Drive, Suite 700B, Chicago, IL 60654; Agent of Service of Process: Josh Scheinfeld.

Dated: February 21, 2024

Respectfully submitted,

**WALCO FUNDING, LLC,**

Plaintiff.

By: /s/ Maxwell A. Kling  
One of Its Attorneys

Matthew R. Barrett ([mbarrett@hmblaw.com](mailto:mbarrett@hmblaw.com))

Maxwell A. Kling ([mkling@hmblaw.com](mailto:mkling@hmblaw.com))

**HORWOOD MARCUS & BERK CHARTERED**

500 West Madison Street, Suite 3700

Chicago, Illinois 60661

Phone: (312) 606-3200

Atty No: 34957

**VERIFICATION**

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned verifies that he is an authorized agent of WalCo Funding, LLC, and that the statements set forth in the attached **PLAINTIFF'S ANSWERS TO DEFENDANTS' FIRST INTERROGATORY** are true and correct, except as to any matter therein stated to be on information and belief, and as to such matter the undersigned certifies as aforesaid that he verily believes the same to be true.

Dated: February 21, 2024

**WalCo Funding, LLC**

By: Paul M Walder

Printed Name: Paul M Walder

Title: CEO

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he caused a true and correct copy of the foregoing, **PLAINTIFF'S ANSWERS TO DEFENDANTS' FIRST SET OF INTERROGATORIES**, to be served on the individuals listed below by electronic mail on this 21st day of February, 2024, addressed as follows:

Adam Goodman  
GOODMAN TOVROV HARDY & JOHNSON LLC  
105 West Madison Street, Suite 2300  
Chicago, Illinois 60602  
[agoodman@goodtov.com](mailto:agoodman@goodtov.com)

/s/ Maxwell A. Kling